



# Iowa Department of Human Services

Terry E. Branstad  
Governor

Kim Reynolds  
Lt. Governor

Charles M. Palmer  
Director

## INFORMATIONAL LETTER NO.1478

**DATE:** February 16, 2015

**TO:** Iowa Medicaid Nursing Facilities

**ISSUED BY:** Iowa Department of Human Services, Iowa Medicaid Enterprise (IME)

**RE:** Other Provider Preventable Conditions (OPPC) - Nursing Facilities (NF)

**EFFECTIVE:** March 1, 2015

Section 2702 of the Patient Protection and Affordable Care Act of 2010 (ACA) prohibits federal payments for any amount expended for health care-acquired conditions. The federal regulations at 42 CFR 447.26 to implement the requirement specify that payment cannot be made for other provider-preventable conditions (OPPC) for any health care setting.

Under this regulation, states are required to identify the following conditions for non-payment:

- Wrong surgical or other invasive procedure performed on a patient
- Surgical or other invasive procedure performed on the wrong body part
- Surgical or other invasive procedure performed on the wrong patient

In the NF setting, the IME expects a fairly limited subset of such “invasive” procedures. However, NF providers should review the [definition of “surgical or other invasive procedure” that has been adopted in the department’s rules](#)<sup>1</sup>, which will be effective March 1, 2015.

When a NF provider encounters an OPPC, **any days that are attributable to the OPPC must be reported as non-covered days** on the electronic institutional claim form. If there are other types of non-covered days on the claim, these should simply be added to the total. **In addition, at least one diagnosis code from the list below should be on the claim:**

- E876.5-Performance of wrong operation (procedure) on correct patient
- E876.6-Performance of operation (procedure) on patient not scheduled for surgery
- E876.7-Performance of correct operation (procedure) on wrong side/body part

It is the responsibility of the provider to identify and report any OPPC and not seek payment from Medicaid for any additional expenses incurred as a result of the OPPC.

The IME appreciates your continued partnership. If you have any questions, please contact the IME Provider Services Unit at 1-800-338-7909, locally in Des Moines at 515-256-4609 or via email at [imeproviderservices@dhs.state.ia.us](mailto:imeproviderservices@dhs.state.ia.us).

<sup>1</sup> <https://www.legis.iowa.gov/docs/ACO/IAC/LINC/01-07-2015.Rule.441.81.1.pdf>